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June 21, 2016

Federal Communications Commission
Mrs. Marlene Dortch, Secretary
445 12th Street, S.W.
Washington, DC 20554

RE: RM-11681 Petition for Rulemaking: Ligado's Request to Allocate the 1675-1680 MHz band
for Terrestrial Mobile Use Shared With Federal Use

Dear Ms. Dortch:

Seattle City Light is one of the nation's largest municipally owned public utilities and serves approximately 415,000 customers in the City of Seattle and eight adjacent jurisdictions. Seattle City Light operates several hydroelectric dams in northern Washington state under federal licenses that require real-time monitoring to ensure flood control, fisheries protection, and dam safety. Seattle City Light uses data collected by the United States Geological Survey (USGS) via the Geostationary Operational Environmental Satellites Data Collection System (GOES DCS) for monitoring of hydrological conditions in and around our hydroelectric dams.

Real-time river flow and reservoir height data transmitted by GOES DCS are critical for maintaining compliance with our federal licenses and protecting endangered fish species. In particular, maintaining our reservoirs at levels that allow for flood protection during storm and rapid snowmelt events is impossible without this data. For this reason, Seattle City Light funds partially the USGS streamgauge network.

Seattle City Light has concerns regarding the Federal Communication Commission's plan to share the 1675-1680 Megahertz radio spectrum, used by GOES DCS, with commercial terrestrial mobile uses. Reliable, accurate, and timely data is imperative for the daily, hourly, and minute to minute operations of our hydroelectric facilities. We urge the FCC to provide protections that ensure the reliable functioning of the GOES DCS system. Such protection is crucial to avoid the disruption of information used by Seattle City Light to comply with federal requirements at our hydroelectric facilities.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robin Cross", written over a faint circular seal of Seattle City Light.

Robin Cross
Manager, Wholesale Contracts

CC: Director Suzette Kimball, United States Geological Survey